

NO. FBT CV 15 6048103 S : SUPERIOR COURT

DONNA L. SOTO, ADMINISTRATRIX OF
THE ESTATE OF VICTORIA L. SOTO, ET AL : J.D. OF FAIRFIELD

V. : AT BRIDGEPORT

BUSHMASTER FIREARMS
INTERNATIONAL, LLC, a/k/a, ET AL : JULY 25, 2016

**PLAINTIFFS' OBJECTIONS TO DEFENDANT REMINGTON'S FIRST
REQUESTS FOR PRODUCTION DATED MAY 26, 2016**

The plaintiffs, DONNA L. SOTO, ADMINISTRATRIX OF THE ESTATE OF VICTORIA L. SOTO, DECEASED; IAN AND NICOLE HOCKLEY, CO-ADMINISTRATORS OF THE ESTATE OF DYLAN C. HOCKLEY; WILLIAM SHERLACH, EXECUTOR OF THE ESTATE OF MARY J. SHERLACH; WILLIAM SHERLACH, INDIVIDUALLY; LEONARD POZNER, ADMINISTRATOR OF THE ESTATE OF NOAH S. POZNER; GILLES J. ROUSSEAU, ADMINISTRATOR OF THE ESTATE OF LAUREN G. ROUSSEAU; DAVID C. WHEELER, ADMINISTRATOR OF THE ESTATE OF BENJAMIN A. WHEELER; NEIL HESLIN AND SCARLETT LEWIS, CO-ADMINISTRATORS OF THE ESTATE OF JESSE McCORD LEWIS; MARK BARDEN AND JACQUELINE BARDEN, CO-ADMINISTRATORS OF THE ESTATE OF DANIEL G. BARDEN; MARY D'AVINO, ADMINISTRATRIX OF THE ESTATE OF RACHEL M. D'AVINO; and NATALIE HAMMOND, hereby object to Defendant Remington's First Requests for Production dated May 26, 2016, as follows:

DEFINITIONS

1. "Subject Firearm" means the Bushmaster XM-15 semi-automatic rifle used in the December 14, 2012 shooting incident.
2. "Remington" means Remington Arms Company, LLC, Remington Outdoors Company, LLC, Bushmaster Firearms International, LLC and any of their parent, subsidiary and affiliated companies, and any employee and agent of the companies.

3. “Shooting Incident” means the December 14, 2012 shooting incident that occurred at Sandy Hook Elementary School.
4. “Mass Shooting” means a shooting incident in which four or more persons were killed.

REQUESTS FOR PRODUCTION

1. Documents concerning the unsuitability of AR-type semi-automatic rifles for home defense and recreational uses.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.

- g. To the extent this Request is otherwise permissible, it is premature.**
- 2. Documents concerning Remington's status as a "seller" of the Subject Firearm, as the term "seller" is defined in 15 U.S.C. § 7903(6).

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.**
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their "possession, custody or control," which plaintiffs cannot be compelled to produce. Practice Book § 13-9.**
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. "Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure." Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat'l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that "the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents").**
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their "possession, custody or control" on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs' knowledge is not in issue.**
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.**
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.**
- g. To the extent this Request is otherwise permissible, it is premature.**

3. Documents concerning the adoption of the Bushmaster XM-15 semi-automatic rifle by the United States military and other armed forces around the world.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

4. Documents concerning the adoption of any AR-type semi-automatic rifle by the United States military and other armed forces around the world.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

5. Documents concerning the differences between the Bushmaster XM-15 semi-automatic rifle and the M16 rifle adopted and used by the United States military.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

6. Documents concerning superior lethality of the Bushmaster XM-15 semi-automatic rifle above and beyond other semi-automatic firearms.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.

- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
 - c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
 - d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - f. To the extent this Request is otherwise permissible, it is premature.
7. Documents concerning Remington’s marketing of the Bushmaster XM-15 semi-automatic rifle for use in military combat.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible

to Remington. Indeed, Remington's marketing documents are clearly more accessible to Remington than to plaintiffs because Remington created them. "Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure." Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat'l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that "the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents").

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their "possession, custody or control" on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs' knowledge is not in issue.
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
8. Documents concerning marketing of the Bushmaster XM-15 semi-automatic rifle as a combat weapon used for the purpose of waging war and killing human beings.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their "possession, custody or control," which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, Remington's marketing documents are clearly more accessible to Remington than to plaintiffs because Remington created them. "Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially*

greater facility than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
9. Documents concerning the unsuitability for civilian use of firearms with low recoil.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the

documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

10. Documents concerning the unsuitability for civilian use of accurate firearms.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to

Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.

- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

11. Documents concerning the unsuitability for civilian use of firearms with rapid second shot capability.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.

- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
12. Documents concerning the unsuitability for civilian use of firearms capable of accepting large capacity magazines.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.

- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.**
 - g. To the extent this Request is otherwise permissible, it is premature.**
- 13. Documents concerning the ownership of semi-automatic rifles for self-defense use by law-abiding citizens.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.**
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.**
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).**
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.**
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.**
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.**
- g. To the extent this Request is otherwise permissible, it is premature.**

14. Documents concerning the risk of ammunition over-penetration when semi-automatic firearms are used for home defense.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

15. Documents concerning the military's conclusion that use of the M16 rifle in close quarters greatly increases the risk of non-combat casualties.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their "possession, custody or control," which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. "Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure." Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat'l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that "the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents").
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their "possession, custody or control" on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs' knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

16. Documents concerning a study of a database maintained by the National Rifle Association Institute for Legislative Action regarding the number of shots fired in self-defense encounters.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

17. Documents concerning the likelihood of an AR-type semi-automatic rifle causing accidental harm when used for self-defense purposes in the home.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

18. Documents concerning the use of AR-type semi-automatic rifles in hunting.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

19. Documents concerning the use of AR-type semi-automatic rifles in competitive shooting events.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

20. Documents concerning the use of AR-type semi-automatic rifles in recreational target shooting.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

21. Documents concerning the number of AR-type semi-automatic rifles sold in the United States for civilian use during the years 2005 – 2012.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

22. Documents concerning the use of AR-type semi-automatic rifles in crimes.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.

- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
 - c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
 - d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
23. Documents concerning the occurrence of Mass Shootings in the United States from 2005 to 2012.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.

- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
 - d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - f. To the extent this Request is otherwise permissible, it is premature.
24. Documents concerning the types of firearms possessed and used in Mass Shootings in the United States from 2005 to 2012.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to

request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

25. Documents concerning the use of AR-type semi-automatic rifles in Mass Shootings in the United States from 2005 to 2012.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore

what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.

- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

26. Documents concerning the manner in which the Subject Firearm was stored in the home of Nancy Lanza.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

27. Documents concerning law enforcement's investigation of the Shooting Incident.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their "possession, custody or control," which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. "Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure." Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat'l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that "the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents").
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their "possession, custody or control" on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs' knowledge is not in issue.
- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

28. Document's concerning Remington's marketing, branding, promotion and advertising of the Bushmaster XM-15 semi-automatic rifle.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their "possession, custody or

control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.

- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, Remington’s marketing, branding, promotion and advertising documents are clearly more accessible to Remington than to plaintiffs because Remington created them. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

29. Documents concerning the depiction of the Bushmaster XM-15 semi-automatic rifle in video games.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.

- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington; indeed, such documents are likely more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
 - d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
30. Documents concerning public statements made by Remington, made on behalf of Remington or attributed to Remington regarding the Shooting Incident.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, public statements made by Remington or on its behalf are clearly more accessible to Remington than to plaintiffs.

“Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.**
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.**
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.**
 - g. To the extent this Request is otherwise permissible, it is premature.**
31. Documents concerning public statements made by Remington, made on behalf of Remington or attributed to Remington regarding the Subject Firearm.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.**
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.**
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, public statements made by Remington or on its behalf are clearly more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also***

Deutsche Bank Nat'l Trust Co. v. Griffin, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
32. Documents concerning public statements made by Remington, made on behalf of Remington or attributed to Remington regarding the suitability of AR-type semi-automatic rifles for civilian use.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, public statements made by Remington or on its behalf are clearly more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat'l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the

public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
33. Documents concerning Remington’s knowledge that the sale of AR-type semi-automatic rifles for civilian use posed an unreasonable risk of physical injury to others.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, documents demonstrating Remington’s knowledge are clearly more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
34. Documents concerning Remington’s knowledge of civilians’ poor track record of safely securing firearms.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, documents demonstrating Remington’s knowledge are clearly more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore

what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.

- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

35. Documents concerning Remington’s knowledge of an unreasonably high risk that the Bushmaster XM-15 semiautomatic rifle would be used in a Mass Shooting.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, documents demonstrating Remington’s knowledge are clearly more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.

- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
 - f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - g. To the extent this Request is otherwise permissible, it is premature.
36. Documents concerning Remington's sale of AR-type semi-automatic rifles in a manner that foreseeably leads to the use of the rifles by unauthorized and unsafe users.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their "possession, custody or control," which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, documents concerning Remington's sales practices are clearly more accessible to Remington than to plaintiffs. "Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure." Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat'l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that "the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents").
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their "possession, custody or control" on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs' knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.

37. **f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.**
- g. To the extent this Request is otherwise permissible, it is premature.**
37. Documents concerning Remington's ability to manufacture AR-type semi-automatic rifles with mechanisms that prevent rifles from being fired by someone other than the purchaser.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. Indeed, documents concerning Remington’s manufacturing capabilities are clearly more accessible to Remington than to plaintiffs. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.

- g. To the extent this Request is otherwise permissible, it is premature.
38. Documents concerning the sale of the Subject Firearm by Riverview Sales to Nancy Lanza.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
 - b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
 - c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
 - d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
 - e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
 - f. To the extent this Request is otherwise permissible, it is premature.
39. Documents concerning the lawful use or uses of the Subject Firearm by Nancy Lanza and Adam Lanza.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.

- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

40. Documents concerning Nancy Lanza’s ownership of firearms.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially*

greater facility than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

41. Documents concerning Adam Lanza’s exposure to printed and online marketing, advertising or promotional material regarding Remington products, including the Subject Firearm.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the

public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).

- d. The plaintiffs object to this Request because it is not reasonably calculated to lead to the discovery of admissible evidence. Since this Request seeks information known to and readily available to Remington, the only conceivable purpose of the Request is to explore what information the plaintiffs have in their “possession, custody or control” on this issue. To the extent such information is not privileged, it is irrelevant because plaintiffs’ knowledge is not in issue.
- e. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.
- f. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- g. To the extent this Request is otherwise permissible, it is premature.

42. Documents concerning oral and written statements of any person with personal knowledge of any matter alleged in the First Amended Complaint.

OBJECTIONS:

- a. The plaintiffs object to this Request to the extent it calls for attorney-client and work product privileged information.
- b. The plaintiffs object to this Request to the extent it calls for the production of documents not within their “possession, custody or control,” which plaintiffs cannot be compelled to produce. Practice Book § 13-9.
- c. The plaintiffs object to this Request as unduly burdensome, insofar as it seeks documents that are publicly available and/or easily accessible to Remington. “Discovery shall be permitted if the disclosure sought . . . can be provided by the disclosing party or person with *substantially greater facility* than it could otherwise be obtained by the party seeking disclosure.” Practice Book § 13-2 (emphasis supplied); *see also Deutsche Bank Nat’l Trust Co. v. Griffin*, 2008 WL 1948029, at *2 (Conn. Super. April 22, 2008) (Marano, J.) (sustaining objection to request for production on grounds that “the documents are in the public domain and as such, can be obtained with the same facility as if the plaintiff were to hand over the documents”).
- d. The plaintiffs object to this Request because it is vague regarding the timeframe to which it applies and accordingly is overbroad.

- e. To the extent this Request calls for plaintiffs to produce to Remington documents that Remington itself or the other defendants have produced, or will subsequently produce, it is unduly burdensome.
- f. To the extent this Request is otherwise permissible, it is premature.

Notwithstanding these objections, statements made by the plaintiffs that are within their possession, custody or control concerning the shooting at Sandy Hook Elementary School and plaintiffs' losses will be produced.

THE PLAINTIFFS,

By /s/

JOSHUA D. KOSKOFF
ALINOR C. STERLING
KATHERINE MESNER-HAGE
jkoskoff@koskoff.com
asterling@koskoff.com
khage@koskoff.com
KOSKOFF KOSKOFF & BIEDER
350 FAIRFIELD AVENUE
BRIDGEPORT, CT 06604
PHONE: (203) 336-4421
FAX: (203) 368-3244
JURIS #32250

CERTIFICATION

This is to certify that a copy of the foregoing has been mailed, postage prepaid, and emailed this day to all counsel of record, to wit:

*For Bushmaster Firearms International LLC, a/k/a;
Freedom Group, Inc., a/k/a;
Bushmaster Firearms, a/k/a;
Bushmaster Firearms, Inc., a/k/a;
Bushmaster Holdings, Inc., a/k/a
Remington Arms Company, LLC, a/k/a;
Remington Outdoor Company, Inc., a/k/a*

Jonathan P. Whitcomb, Esq.
Scott M. Harrington, Esq.
Diserio Martin O'Connor & Castiglioni, LLP
One Atlantic Street
Stamford, CT 06901
jwhitcomb@dmoc.com
TEL: (203) 358-0800
FAX: (203) 348-2321

*For Remington Arms Company, LLC, a/k/a;
Remington Outdoor Company, Inc., a/k/a*

Andrew A. Lothson, Esq.
James B. Vogts, Esq.
Swanson Martin & Bell, LLP
330 North Wabash, #3300
Chicago, IL 60611
alothson@smbtrials.com
jvogts@smbtrials.com
TEL: (312) 321-9100
FAX: (312) 321-0990

For Camfour, Inc.;
Camfour Holding, LLP, a/k/a

Scott Charles Allan, Esq.
Christopher Renzulli, Esq.
Renzulli Law Firm, LLP
81 Main Street, #508
White Plains, NY 10601
sallan@renzullilaw.com
TEL: (914) 285-0700
FAX: (914) 285-1213

For Riverview Sales, Inc.;
David LaGuercia

Peter Matthew Berry, Esq.
Berry Law LLC
107 Old Windsor Road, 2nd Floor
Bloomfield, CT 06002
firm@berrylawllc.com
TEL: (860) 242-0800
FAX: (860) 242-0804

/s/

JOSHUA D. KOSKOFF
ALINOR C. STERLING
KATHERINE MESNER-HAGE